

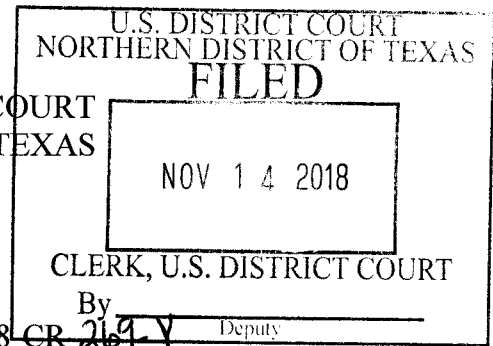
IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

UNITED STATES OF AMERICA

v.

LAURIE ANN REESE

No. 4:18



FACTUAL RESUMÉ

I. Plea:

The defendant is pleading guilty to Count One of the Information, charging Bank Fraud, in violation of 18 U.S.C. § 1344.

II. Penalties:

The penalties the Court can impose include:

- a. imprisonment for a period not to exceed thirty years;
- b. a fine not to exceed one million dollars, or both such fine and imprisonment;
- c. a term of supervised release of not more than five years, which may be mandatory under the law and will follow any term of imprisonment. If the defendant violates any condition of the term of supervised release, the Court may revoke such release term and require that the defendant serve an additional period of confinement;
- d. a mandatory special assessment of \$100;
- e. forfeiture of property; and
- f. restitution to victims or to the community; and
- g. costs of incarceration and supervision.

III. Elements of the Offense:

In order to establish the offense alleged in Count One of the Information, the government must prove the following elements beyond a reasonable doubt:

- First: That the defendant knowingly executed a scheme or artifice;
- Second: That the scheme or artifice was to defraud a financial institution, as alleged in the information;
- Third: That the defendant had the intent to defraud the financial institution;
- Fourth: That the scheme or artifice to defraud employed a false material representation; and
- Fifth: That the defendant placed the financial institution at risk of civil liability or financial loss.

or

- First: That the defendant knowingly executed a scheme or artifice;
- Second: That the scheme or artifice was executed to obtain monies or other property from a financial institution, as alleged in the information;
- Third: That the scheme or artifice was executed by means of false or fraudulent pretenses, representations, or promises; and
- Fourth: That the false or fraudulent pretenses, representations, or promises were material.

IV. Stipulated Facts:

From on or about January 6, 2013, through on or about April 19, 2018, in the Fort Worth Division of the Northern District of Texas, defendant **Laurie Ann Reese** (“**Reese**”) did knowingly and intentionally execute a scheme to defraud the American National Bank of Texas, a financial institution as defined in 18 U.S.C. § 20, and to obtain money or property under the custody and control of the American National Bank of Texas while working for the Jewish Federation of Fort Worth and Tarrant County (“JFFWTC”).


From on or about January 6, 2013, through on or about April 19, 2018, **Reese** was a controller for the JFFWTC. Her duties included preparing checks for signature and managing JFFWTC's financial accounts. JFFWTC employed **Reese** beginning in December 2000. **Reese** did not have signatory authority on any of JFFWTC's bank accounts.

Reese, without lawful authority, knowingly and fraudulently used a signature stamp of a JFFWTC executive and forged another signature of a JFFWTC executive on JFFWTC checks drawn from JFFWTC's account at the American National Bank of Texas in Fort Worth, Texas, in the Northern District of Texas. **Reese** made the checks payable to herself, and presented the fraudulent checks, or caused the fraudulent checks to be presented, at various financial institutions, located in the Northern District of Texas.

With respect to one of the fraudulent checks in furtherance of the scheme, **Reese** took the following actions. On or about December 29, 2014, **Reese** wrote JFFWTC check number 6303 drawn from JFFWTC's American National Bank of Texas checking account in the amount of \$3,108.67. **Reese** made the check payable to **Laurie Reese**, fraudulently used a JFFWTC executive's stamp and forged another JFFWTC executive's signature purportedly authorizing the check, and **Reese** presented the check to Southwest Bank, located at 740 S. Saginaw Boulevard Saginaw, Texas 76179, in the Northern District of Texas. **Reese** then caused \$3,108.67 to be deposited into **Reese's** personal bank account.

AGREED AND STIPULATED on this 19 day of October, 2018.


LAURIE ANN REESE
Defendant


~~ANTONIO BROOK~~ **Brook Antonio, II**
Counsel for Defendant